

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

STEFAN WATHNE, THORUNN WATHNE,
BERGJLOT WATHNE, SOFFIA WATHNE, and
WATHNE, LTD.,

Plaintiffs,

v.

VALERIE SAROFIM and ROB TODD,

Defendants.

-----X

08 CV 00420 (GEL)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed Declaration of Sanjit Shah, executed on March 19, 2008, the exhibits thereto, the accompanying Declaration of Valerie Sarofim, executed on March 17, 2008, and the accompanying memorandum of law, Defendant Valerie Sarofim will move this Court, before the Honorable Gerard E. Lynch, at the Daniel Patrick Moynihan United States Courthouse located at 500 Pearl Street, New York, New York, 10007, Courtroom 6B, at a date and time to be determined by the Court, for an Order, pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, granting Defendant Valerie Sarofim judgment on the pleadings, dismissing the Complaint against her in its entirety, and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
March 19, 2008

MOUND COTTON WOLLAN & GREENGRASS

By: s/Sanjit Shah
Sanjit Shah (SS-0148)
One Battery Park Plaza
New York, New York 10004
Phone: (212) 804-4200
Fax: (212) 344-8066
sshah@moundcotton.com
Attorneys for Defendant Valerie Sarofim

To: Bruce J. Turkle, Esq.
Phillips Nizer LLP
666 Fifth Avenue
New York, NY 10103-0084

Rob Todd, Esq.
Todd Law Firm
4265 San Felipe
Houston, TX 77027

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X
STEFAN WATHNE, THORUNN WATHNE,
BERGJLOT WATHNE, SOFFIA WATHNE, and
WATHNE, LTD.,

08 CV 00420 (GEL)

Plaintiffs,

v.

VALERIE SAROFIM and ROB TODD,

Defendants.
-----X

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of Defendant Sarofim's Notice of Motion for Judgment on the Pleadings pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, the Declaration of Sanjit Shah with exhibits, the Declaration of Valerie Sarofim and Defendant's Memorandum of Law in Support of Motion for Judgment on the Pleadings, was served by United States mail, postage pre-paid, on the 19th day of March 2008 upon those persons or entities listed below.

Bruce J. Turkle, Esq.
Phillips Nizer LLP
666 Fifth Avenue
New York, NY 10103-0084
Attorneys for Plaintiffs

Rob Todd, Esq.
Todd Law Firm
4265 San Felipe
Houston, TX 77027
Defendant Pro Se

/s/ Sanjit Shah
Sanjit Shah (SS-0148)